

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff,

Plaintiff,

v.

ABN AMRO RETAINED NOMINEES (IOM)
LIMITED, f/k/a ABN AMRO Fund Services (Isle of
Man) Nominees, and f/k/a Fortis (Isle of Man)
Nominees Limited, and PLATINUM ALL WEATHER
FUND LIMITED,

Defendants.

Adv. Pro. No. 12-01697 (CGM)

STIPULATION AND ORDER

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the estate of Bernard L. Madoff, individually, and the defendants in this action ABN AMRO Retained Nominees (IOM) Limited, f/k/a ABN

AMRO Fund Services (Isle of Man) Nominees, and f/k/a Fortis (Isle of Man) Nominees Limited, and Platinum All Weather Fund Limited, (together, “Defendants” and collectively, with the Trustee, the “Parties”), by and through their respective, undersigned counsel, hereby stipulate and agree as follows:

1. The Trustee will provide a proposed amended complaint to the Defendants on or before October 12, 2022.
2. The Defendants will indicate whether they consent to the Trustee filing the proposed amended complaint on or before October 26, 2022.
3. On or before November 10, 2022, either:
 - a. If the Defendants consent to the Trustee filing the proposed amended complaint, the Trustee will file the amended complaint.
 - i. Defendants will answer, move, or otherwise respond to the amended complaint on or before January 12, 2023.
 - ii. The Trustee will file any opposition to the Defendants’ motion on or before March 13, 2023.
 - iii. Defendants will file any reply brief in support of their motion on or before April 27, 2023.
 - b. If the Defendants do not consent to the Trustee filing the proposed amended complaint, the Trustee will file his motion for leave to file an amended complaint.
 - i. Defendants will file any opposition to the Trustee’s motion for leave to file an amended complaint by January 12, 2022.
 - ii. The Trustee will file any reply brief in support of his motion on or before February 27, 2023.

4. Except as expressly set forth herein, the Parties reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.
5. The above deadlines granted by this Stipulation are without prejudice to either party seeking future extensions of time.

Dated: September 1, 2022
New York, New York

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Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*

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Nominees, and f/k/a Fortis (Isle of Man)
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*Attorneys for Defendant Platinum All
Weather Fund Limited*

SO ORDERED.

**Dated: September 2, 2022
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**